

Civil Action No. 5:25-cv-00350-BO-KS

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4. Undersigned counsel has existing deadlines in both federal and state matters that have limited, and will continue to limit, her ability to review the complaint and prepare an appropriate response by the current deadline of July 21, 2025.

5. Counsel is currently serving as the Section Head for the Services to State Agencies Section and is temporarily covering responsibilities for the Special Deputy Attorney General representing the Administrative Office of the Courts, whose start date is July 29, 2025. The requested extension of time will allow the newly hired attorney to come on board and assume responsibility for this case.

6. A 60-day extension is requested to allow undersigned counsel adequate time to consult with the Defendant and his office, manage obligations in other matters, and thoroughly investigate and assess the issues and claims raised in the complaint in order to prepare an appropriate and informed response.

7. This motion is submitted in good faith and for the reasons outlined above, and is not intended to cause any delay.

8. Plaintiff has only consented to a thirty (30) day extension to respond to the Complaint to and including August 8, 2025.

WHEREFORE, Defendant District Attorney Waters respectfully moves for an order extending the deadline to file an answer or other responsive pleading, and requests that the new deadline be set for September 19, 2025.

Respectfully submitted, this the 9th day of July, 2025.

JEFF JACKSON

ATTORNEY GENERAL

/s/ Tamika L. Henderson

Tamika L. Henderson

Special Deputy Attorney General

N.C. State Bar No. 42398

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME** with the Clerk of Court using the CM/ECF system. The CM/ECF system will send notification of such filing to all counsel of record and to the following pro se parties, who are registered for electronic notification through CM/ECF:

Angela Newell Gray
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Attorney for Plaintiff

This the 9th day of July, 2025.

/s/ Tamika L. Henderson
Tamika L. Henderson
Special Deputy Attorney General